

FILED

MAY 29 2024

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

MICHELLE MASTERS,

Defendant.

No.

4:24-CR-00260 JAR/SRW

INDICTMENT

The Grand Jury Charges:

COUNT 1

From on or about April 1, 2020, continuing through on or about July 1, 2022, within the Eastern District of Missouri, the defendant,

MICHELLE MASTERS,

did embezzle, steal, purloin, or knowingly convert to her use and the use of another, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: Social Security Title II Disability benefits for P.M. in the amount of \$34,811.00, creating a total loss to the government in excess of \$1,000.00.

All in violation of Title 18, United States Code, Section 641.

COUNT 2

On or about May 28, 2020, within the Eastern District of Missouri, the defendant,

MICHELLE MASTERS,

did embezzle, steal, purloin, or knowingly convert to her use and the use of another, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: a stimulus payment for P.M., paid pursuant to the CARES Act in response to the COVID-19 pandemic in the amount of \$1,200.00, creating a total loss to the government in excess of \$1,000.00.

All in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATION

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 641 as set forth in this Indictment, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation. Also subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violation.

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney